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Gaming, LLC, Pioneer OpCo, LLC, Apollo
Global Management, Inc., Susan Schaffer,
Thomas LaRosa, and Yvonne Brooks*

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

HEATHER KEARNEY, an individual;
TIGRAN KARAKASHYAN, an individual;
FREDRIC SAFLOR, an individual; and
MARK RAYBURN, an individual,

Plaintiffs,

vs.

VENETIAN LAS VEGAS GAMING, LLC
d/b/a THE VENETIAN LAS VEGAS d/b/a
THE VENETIAN RESORT LAS VEGAS, a
domestic limited-liability company;
VENETIAN CASINO RESORT LLC, a
domestic limited-liability company; PIONEER
OPCO, LLC, a domestic limited-liability
company; APOLLO GLOBAL
MANAGEMENT, INC., a corporation;
THOMAS LAROSA, an individual;
YVONNE BROOKS, an individual; SUSAN
SCHAFFER, an individual; BRYAN
GURDEN, an individual; DOES 1-10; and
ROE CORPORATIONS 11-20, inclusive,

Defendants.

Case No.: 2:25-cv-01121-GMN-MDC

**STIPULATION AND ORDER TO
EXTEND TIME FOR DEFENDANTS
TO FILE RESPONSE TO PLAINTIFF'S
COMPLAINT**

(First Request)

Pursuant to Local Rules IA 6-1 and IA 6-2, Defendants Venetian Las Vegas Gaming, LLC, Pioneer OpCo, LLC, Apollo Global Management, Inc., Susan Schaffer, Thomas LaRosa, Yvonne Brooks and Plaintiffs Heather Kearney, Tigran Karakashyan, Fredric Saflor and Mark Rayburn

(“Plaintiffs”) hereby requests that Defendants be granted a three-week extension of time, up to and including July 21, 2025, to file their response to Plaintiffs’ Complaint (ECF. No. 1). The present deadline for Defendant to file its response is June 30, 2025. This is the parties’ first request for an extension of time for Defendant to file its response.

Defendants respectfully request this extension in order to have the time to fully research the facts and circumstances underlying this case, and not for purposes of delay. Good cause exists to extend the response deadline. Therefore, the parties respectfully request a twenty-one day extension of time up to and including July 21, 2025 for Defendants to file their response to Plaintiff’s Complaint.

DATED this 30th day of June, 2025.

OGLETREE, DEAKINS, NASH, SMOAK &
STEWART, P.C

/s/ Molly M. Rezac

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*Attorneys for Defendants, Venetian Las Vegas
Gaming, LLC, Pioneer OpCo, LLC, Apollo
Global Management, Inc., Susan Schaffer,
Thomas LaRosa, and Yvonne Brooks*

DATED this 30th day of June, 2025.

FILIPIAK LAW

/s/ Michael Filipiak

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*Attorneys for Plaintiffs, Heather Kearney,
Tigran Karakashyan, Fredric Saflor and
Mark Rayburn*

ORDER

IT IS SO ORDERED.

UNITED STATES MAGISTRATE JUDGE

7-1-25

DATED